IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION IN ADMIRALTY

TIFFANY N. PROVENCE, as the Personal Representative of the Estate of Juan Antonia Villalobos Hernandez,) C/A No. 2:21-cv-965-RMG)
Plaintiff,	ANSWERS TO PLAINTIFF'S SECOND SET OF INTERROGATORIES TO
Vs) HIGHTRAK STAFFING, INC. d/b/a) HITRAK STAFFING, INC.
UNITED STATES OF AMERICA,)
CROWLEY MARITIME CORPORATION,)
CROWLEY GOVERNMENT SERVICES,)
INC., DETYENS SHIPYARDS, INC., and)
HIGHTRAK STAFFING, INC. d/b/a)
HITRAK STAFFING, INC.)
,)
Defendants.	,)

TO: J. RUTLEDGE YOUNG, III, JULIE L. MOORE AND ROBERT WEHRMAN, ATTORNEYS FOR PLAINTIFF:

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, the Defendant HighTrak Staffing, Inc. d/b/a HiTrak Staffing, Inc. (hereinafter "this Defendant" or "HiTrak"), by and through their undersigned counsel, answers Plaintiff's Second Set of Interrogatories to HighTrak Staffing, Inc. d/b/a HiTrak Staffing, Inc. as follows:

1. List the names and positions of all officers of HiTrak during the last five years, including dates positions were held.

ANSWER:

D. Loy Stewart, Jr. - President / CEO

Leo A. Fary, Jr. - Treasurer

M. Larry Reynolds - Executive Vice President

2. List the names of all board members of HiTrak during the last five years, including the dates board members served.

ANSWER: All of the following Directors listed below have served for all years 2017 to Present.

D. Loy Stewart, Jr.

Jonathan G. Stewart

W. Jason Stewart

Leo A. Fary, Jr.

M. Larry Reynolds

Peter Browne

Richard C. Stokes

- D. Loy Steward Sr. was a Director until he passed away on 6/30/2020.
- 3. List the names of all owners or shareholders of HiTrak during the last five years, including dates of ownership.

ANSWER:

D. Loy Stewart, Jr. - all of the last five years

Jonathan G. Stewart – all of the last five years

W. Jason Stewart - 2020-2021

Leo A. Fary, Jr. – all of the last five years

M. Larry Reynolds - all of the last five years

Peter Browne - 2017-2020

Richard C. Stokes -2017-2020 – ownership from 12/19/2012 to 4/30/2021

D. Loy Steward Sr. - 2017-2019

HOOD LAW FIRM, LLC 172 Meeting Street Post Office Box 1508 Charleston, SC 29402 Phone: (843) 577-4435 Facsimile: (843) 722-1630

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Attorneys for Defendants

Detyens Shipyards, Inc. and Hightrack Staffing, Inc. d/b/a HiTrak Staffing, Inc.

June 24, 2022

Charleston, South Carolina

CERTIFICATE OF SERVICE

I certify that on this date a copy of the ANSWERS TO PLAINTIFF'S SECOND SET OF
INTERROGATORIES TO HIGHTRAK STAFFING, INC. d/b/a HITRAK STAFFING, INC.
was served on each party or counsel of record by mailing, e-mailing, facsimile, or
hand delivery in the manner prescribed by the applicable Rule of Civil Procedure.
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Plaintiff,	SUPPLEMENTAL ANSWERS TO PLAINTIFF'S SECOND SET OF
Vs) INTERROGATORIES TO HIGHTRAK
) STAFFING, INC. d/b/a HITRAK
UNITED STATES OF AMERICA,) STAFFING, INC.
CROWLEY MARITIME CORPORATION,)
CROWLEY GOVERNMENT SERVICES,)
INC., DETYENS SHIPYARDS, INC., and)
HIGHTRAK STAFFING, INC. d/b/a)
HITRAK STAFFING, INC.)
For development and access to the Set of Se)
Defendants.)

TO: J. RUTLEDGE YOUNG, III, JULIE L. MOORE AND ROBERT WEHRMAN, ATTORNEYS FOR PLAINTIFF:

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, the Defendant HighTrak Staffing, Inc. d/b/a HiTrak Staffing, Inc. (hereinafter "this Defendant" or "HiTrak"), by and through their undersigned counsel, supplements its answers Plaintiff's Second Set of Interrogatories to HighTrak Staffing, Inc. d/b/a HiTrak Staffing, Inc. as follows:

1. List the names and positions of all officers of HiTrak during the last five years, including dates positions were held.

ANSWER: In addition to serving as the Treasurer for HiTrak, Leo Fary also serves as the Secretary for HiTrak.

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Attorneys for Defendants Detyens Shipyards, Inc. and Hightrack Staffing, Inc. d/b/a HiTrak Staffing, Inc.

Charleston, South Carolina

CERTIFICATE OF SERVICE